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October 29, 2012

Anthony Herman, Esq., General Counsel
Jeff. S. Jordan, Supervisory Attorney,
Complaints Examination and Legal Administration
Federal Election Commission
999 E Street, NW
Washington, DC 20463

VIA EMAIL to hampton@fec.gov
and USPS

Re: MUR 6660

Dear Attorneys Herman and Jordan:

Thank you for your letters dated October 12, 2012, providing the Angus King for U.S. Senate Campaign ("Campaign"), its official Treasurer, J. Maurice Bisson ("Treasurer"), and Angus King an opportunity to demonstrate in writing that no action should be taken by the Federal Election Commission (FEC) in response to the complaint filed on October 9, 2012. This letter provides a response on behalf of the Campaign, Treasurer Bisson and Angus King. Also enclosed are three Statements of Designation of Counsel for each respondent.

The FEC letter was received by the Campaign on October 15, 2012, and this reply is timely filed within the 15 day deadline.

Please note that the Campaign, its Treasurer and Angus King each consent to public disclosure of these proceedings, and provide this formal consent consistent with your letter guidance.

As a preliminary matter, the Respondents note that the identity of the complainant party is not clear. The Complaint letter was signed by Charles M. Webster, ; Farmington Maine, without any reference to an official capacity. While the complaint letter is written on the letterhead of the Maine Republican Party of 9 Higgins Street, Augusta, Maine, which lists Mr. Webster as State Chairman, and the text indicates that the Republican Party of Maine has filed the complaint, there is no statement in the letter reciting Mr. Webster's capacity or specific authorization or resolutions by the appropriate officers of the Maine Republican Party to file the Complaint on behalf of the Party. Therefore, this response simply refers to the "Complaint".

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For the reasons described below, the FEC should dismiss the Complaint immediately against all respondents. There is no basis in fact or law for a finding that the Campaign, the Treasurer, or Angus King, or any agent of same, violated the provisions of the Act. The FEC staff should recommend that the file should be closed without further action, based upon a determination that there is no factual or legal basis to support a finding of any unlawful coordination between the Campaign or its agents and the non-profit organization, Americans Elect, with regard to the television advertisement described in Exhibit B to the Complaint.

I. The Complaint

The Complaint is unburdened by the weight of fact or law. The Complaint offers a "factual background" section that is largely a litany of partisan attacks on Angus King individually and on the Campaign, claiming that the Campaign is struggling and in free-fall. These partisan Complaint statements are typical political theater, but should not be confused with facts.

A. Complaint Allegations against the Campaign

The Complaint does include two specific factual allegations pertaining to the Campaign and Mr. Cutler. Each is incorrect. Importantly, the Complaint omits a critical fact.

1. Cutler State-Wide Chair

First, on Page 2, the Complaint states that the King Campaign announced Eliot Cutler as one of the Campaign's nine statewide chairman on March 8, 2012. The Campaign agrees that Eliot Cutler is one of the nine statewide chairs (3 Republicans, 3 Democrats and 3 Independents), but notes that the Complaint gives an incorrect announcement date. As the Complaint's A press release byline date demonstrates, the announcement was made on May 1, 2012.

2. Cutler as American Elect Board Member

Second, on Page 2, the Complaint states that Eliot Cutler has been a member of the Americans Elect board of directors since December 15, 2011 and "continuing today." This is incorrect. As noted below, Eliot Cutler confirmed in a public statement on October 5, 2012 that he had resigned from the Americans Elect board of directors effective June, 2012. When accessed on October 24, 2012, the Americans Elect website cited by the Complaint and included in Complaint Exhibit C has been updated to list Eliot Cutler as a former board member (along with other former board members Governor Christine Todd Whitman, Ambassador Stephen W. Bosworth, Admiral Dennis Blair, and Irvine O. Hockaday). See, <http://www.americansselect.org>. (Exhibit 1 attached hereto).

3. The Omission of Fact - Cutler Resignation

The Complaint omits a critical fact. The Complaint fails to disclose to the FEC that Eliot Cutler had made statements to the press on October 5 that he had resigned from the Americans Elect board of directors in June and was unaware of the Americans Elect advertisement buy. The Bangor Daily News on-line article by staff writer Matthew Stone, posted at 11:52 am on October 5, 2012 and last modified on October 5 at 7:31 pm, documented these facts. (See article attached as Exhibit 2). The October 5, 2012 Portland Press Herald on-line article by John Richardson also reported that Eliot Cutler had explained his June 2012 resignation, and had confirmed that he had not had any involvement with Americans Elect since June:

"Americans Elect tried to hold an online primary and nominate a presidential candidate to challenge the two-party system this year. Its entire board of directors resigned in June when that effort failed, according to Wachtel and Eliot Cutler, who ran for governor in Maine in 2010 and was on the Americans Elect board.

The group's founder and CEO reconstituted the group this summer to help independent-minded candidates in state races.

Cutler is now a state chair of King's Senate campaign. He said he has not had any involvement with the national group since June, although he was named as a director on the group's website Friday.

The Maine Republican Party said Friday that it is seeking a federal investigation into whether the ad campaign violates election law, in part because Cutler is listed as a director of the group at the same time he is working in the King campaign. Outside groups cannot coordinate with the candidates they support."

(See article attached as Exhibit 2).

The extensive October 5 coverage by two of Maine's leading newspapers raises the serious question whether the Complainant was aware of the fact that Cutler had announced his June 2012 resignation from Americans Elect and his denial of any awareness of the disputed television advertisement. If the Complainant chose to seize upon the outdated listing of Americans Elect website board of directors list to file the Complaint with the FEC, all while withholding information in the Complainant's possession that Eliot Cutler had explained his resignation from the Americans Elect board and had no involvement in the television ad raises, at best, serious issues about the credibility of the Complainant and, at worst, concerns about abuse of the FEC complaint process.

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The Complaint letter cites a Politico blog by Maggie Hagerman with a byline of October 5 at 12:19 pm, attaching the blog as Complaint Exhibit D, as well as an article in the Daily Caller with a byline of October 5 at 12:10 pm. But the Complaint omits reference to an earlier filed October 5 on-line article by Matthew Stone (original version) or its later October 5 update, and the John Richardson October 5 article – both of which quote Eliot Cutler's explanation that he had resigned from the Americans Elect board as of June 2012. The Complaint letter was not received by the FEC until October 9 – raising the significant question about the Complainant's opportunity to acquire and share the complete factual background with the FEC.

B. Complaint Allegations against Angus King

The Complaint is devoid of any factual allegations pertaining to any action by Angus King, candidate for U.S. Senate that contributed to the fictitious illegal coordination.

The Complaint merely states in paragraph one that Complaint seeks an investigation by the FEC into the alleged illegal coordinated spending practices of Mr. Cutler and Americans Elect and the "illegal acceptance by Mr. King and his principal campaign committee, Angus King for Senate, of contributions from Americans Elect." Thus, the Complaint contains no allegation of wrongdoing by Angus King, and furthermore, errs as a matter of fact and law by merging the Candidate for U.S. Senate and the Campaign for purposes of FEC law. There being no allegation of wrongdoing by Mr. King, the Complaint against Mr. King should be dismissed.

II. Accurate Facts Provided by the Campaign

The Campaign provides the following accurate facts to the FEC:

1. Eliot Cutler has announced publicly that he resigned from the Americans Elect board of directors effective as of June 2012. See Exhibit 2 October 5, 2012 Matthew Stone Bangor Daily news article and October 5, 2012 John Richardson Portland Press Herald article.
2. Eliot Cutler announced on October 5, 2012 that he was not even aware of the Americans Elect television advertisement buy, thereby confirming that he did not consult with or coordinate with Americans Elect with regard to the television advertisement referenced in Complaint Exhibit B. See Exhibit 2 Bangor Daily News article.
3. The Campaign did not expressly or impliedly authorize Mr. Cutler or any other individual to act as an agent of the Campaign with regard to any unlawful coordinated communications with Americans Elect pertaining to the television advertisement referenced in Complaint Exhibit B. See Affidavit of Kathryn ("Kay") Rand, Campaign Manager.

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4. The Campaign did not authorize any individual to request or suggest that Americans Elect create or run the television ad within the meaning of 11 CFR section 109.21(d)(1). See Affidavit of Kay Rand, Campaign Manager.

5. The Campaign did not authorize any individual to communicate with Americans Elect concerning television advertisement content, intended audience, means of communication, specific media outlets, timing or frequency of the communication, or duration of the communication as described in 11 CFR section 109.21(d)(1). See Affidavit of Kay Rand, Campaign Manager.

6. The Campaign did not authorize any individual to have any substantial discussions with Americans Elect about the television advertisement that are material to the creation, production, or distribution of the communication as described in 11 CFR section 109.21. See Affidavit of Kay Rand, Campaign Manager.

7. Americans Elect has filed a certified statement with the FEC in each of its October 2012 48-Hour Expenditure Reports reporting the expenditures with regard to the disputed television ad attesting to the fact that there was no coordination with the Campaign or any of its agents: "Under penalty of perjury, I certify that the independent expenditures reported herein were not made in cooperation, consultation or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or any political party committee or its agent."

In sum, the factual record confirms that there is no basis to find any unlawful coordination between the Campaign or its agents and Americans Elect pertaining to the disputed television advertisement.

III. Legal Analysis

The only legal theory offered by the Complainant to suggest that the alleged illegal coordinated communication occurred is the sheer speculation that Eliot Cutler served as one of nine statewide chairs for the Campaign while also serving as a member of the board of directors of Americans Elect at the time of the Americans Elect decision to buy television advertisement time and, therefore, Cutler must have served as an agent of the Campaign and must have coordinated with Americans Elect on the content of the television advertisement. The Complaint states:

"It is inconceivable that the pro-King Americans Elect communications were made without substantial discussions, material involvement, or the request or suggestion of Cutler – an agent of the King campaign. As such, there is reason to believe that Americans Elect has made prohibited in-kind contributions to King when it paid for a pro-King television ad illegally coordinated with King." (Page 5, final paragraph).

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As noted above, the sole linchpin of the Complaint – the claimed simultaneous service by Cutler as one of nine State-wide Campaign Chairs and as an Americans Elect board of director member at the time of the advertisement buy by the Americans Elect group – has no basis in fact. There is no other specific factual allegation in the Complaint to support the contention that Eliot Cutler was an agent of the Campaign or that Eliot Cutler engaged in illegal coordination of communications.

The accurate facts and the law demonstrate that the Campaign never designated Eliot Cutler as an agent of the Campaign to carry out any illegal communication coordination activities, and that Eliot Cutler never engaged in any such illegal activities in any event.

A. Agent Status

Eliot Cutler's role as one of nine state-wide Chairs of the Campaign does not confer "agent" status upon Cutler for purposes of the illegal coordination analysis.

To be an "agent" of a candidate's committee for the purposes of determining whether a communication is coordinated, a person must have actual authorization, either express or implied, from a specific principal to engage in specific activities, and then engage in those activities on behalf of that specific principal. (FEC website, "Coordinated Communications and Independent Expenditures" (updated February 2011), Coordinated Communications section, <http://fec.gov/pages/brochures/index.shtml#CC>). 11 CFR section 109.3(b)(1) through (6).

There is no basis in fact to conclude that the Campaign ever provided such authorization to Mr. Cutler to engage in any of the specific activities listed in 11 CFR 109.3 (b)(1) through (6). To the contrary, as the Affidavit of Kay Rand (See Exhibit 3) demonstrates, the Campaign did not give any authorization to Mr. Cutler to undertake the specific activities listed in 11 CFR section 109.3(b)(1) through (6) coordinate with Americans Elect, or to otherwise coordinate on the disputed television advertisement. Mr. Cutler will independently confirm that he did not communicate with Americans Elect or its agents at any time with regard to any of the specific activities listed in 11 CFR 109.3(b)(1) through (6) in connection with the disputed television advertisement.

B. Unlawful Coordination Activities

The Affidavit of Campaign Manager, Kay Rand, makes clear that the Campaign did not give express or implied authority to Eliot Cutler, or any other person, to engage in any unlawful coordination activities with Americans Elect pertaining to the disputed television advertisement.

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Given the record evidence that Eliot Cutler resigned from Americans Elect board of directors along with other board members in June 2012, and was not aware of the disputed television advertisement until its broadcast, the FEC must find that the Complaint fails to offer a factual basis for the alleged illegal coordination.

Finally, the FEC should find that the transcript of the disputed television advertisement included as Complaint Exhibit B reveals that the exemptions for publicly available information found in 11 CFR 109.21(d)(2) and (3) would apply to this simple and general television advertisement. Those provisions provide that the "material involvement and "substantial discussions" criteria of the "Content Prong" would not be satisfied if the information material to the creation, production, or distribution of the communication was obtained from a publicly available source. This exemption properly applies here in any event, where the contents of the disputed television advertisement are simple, alluding to the ubiquitous campaign themes of jobs and partisan gridlock in Washington, DC.

IV. SUMMARY

Angus King, The Angus King for U.S. Senate Campaign and its Treasurer, Maurice Bisson, request that the FEC find that there is no factual or legal basis for the Complaint and close the file on MUR 6660.

If the FEC determines that any additional proceedings should continue with regard to the Complaint, the respondents request that the FEC clarify the identity of the Complainant, and require that the Complainant provide specific and complete factual basis for allegations against respondents, and offer the respondent an opportunity to respond to any new allegations.

Elizabeth R. Butler *Elizabeth R. Butler*

Elizabeth R. Butler, Esq.
Pierce Atwood LLP
Merrill's Wharf, 254 Commercial Street
Portland, Maine 04101
Counsel for Respondents:
Angus S King, Jr.
Angus King for U.S. Senate Campaign
J. Maurice Bisson, Treasurer for Angus King for U.S. Senate Campaign

EXHIBIT 1

14054M0M1404

Americans Elect

Politics aren't working for people. This problem must be addressed at the root by fixing the way we elect our leaders. Changing the system by creating the first nonpartisan, national online presidential primary is a daunting task—changing history usually is. Millions of people now support Americans Elect, and we are humbled by that. We are confident that our founding idea can lead to the change Americans are seeking. There is much more to do.

Thank you for taking part!

The First National Online Primary



Enter your email for updates

[Give to Americans Elect](#)

Credits

Thank you to everyone who helped develop the AmericansElect.org website.

board of directors

- Peter Ackerman
- Adm. Dennis Blair (Former)
- Amb. Stephen W. Bosworth (Former)
- Kahlil Byrd
- Eliot R. Cutler (Former)
- Irvine O. Hockaday Jr. (Former)
- Joshua S. Levine
- Gov. Christine Todd Whitman (Former)

board of advisors

- Elliot L. Ackerman
- Jackie Adams
- David Albertson
- Judy Albertson
- Neil A. Allen
- Melvin T. Andrews
- Kellen Arno
- Michael Arno
- Dr. F. Christopher Arterton

EXHIBIT 2

14054M10M1010

BANGOR DAILY NEWS

Outside group buys \$500,000 in ads supporting King; GOP alleges illegal coordination

By Matthew Stone, BDN Staff
Posted Oct. 05, 2012, at 11:52 a.m.

AUGUSTA, Maine — A national nonprofit organization that gained ballot access in 29 states and attempted to run an online presidential primary has purchased ads supporting independent Senate candidate Angus King, calling the former governor "an independent fighter for Maine."

Television station records show the group Americans Elect has purchased nearly \$500,000 in advertising supporting the independent former governor's U.S. Senate bid. The organization purchased \$344,000 in advertising in the Portland market and spent \$151,000 in the Bangor market for advertising spots that started running Friday and will continue through Oct. 25, according to the public records.

Expenditure reports filed with the Federal Election Commission show the group also has paid for \$150,000 for polling and research in Maine's Senate race.

Maine's Republican Party responded swiftly Friday afternoon, requesting a Federal Election Commission investigation into whether King's campaign illegally coordinated with Americans Elect, since Eliot Cutler, who ran for governor in 2010 as an independent is listed as both a member of the Americans Elect board of directors and one of nine state chairs for King's campaign.

Outside groups set up to make unlimited expenditures in hopes of influencing elections aren't allowed under federal election law to coordinate with candidates' campaigns.

According to news reports, Americans Elect spent nearly two years qualifying for ballot access in hopes of nominating a third-party presidential candidate through an online nominating convention. Despite raising millions of dollars, the group called off its presidential efforts in May after no prospective candidate met the group's qualifications: attracting 10,000 clicks of support, with the clicks spread across at least 10 states. Former Louisiana Gov. Buddy Roemer came closest.

Reached Friday, Cutler said he stepped down from the Americans Elect board in June and that he was unaware of the group's ad buy.

"There was going to be a change in focus to state races, generally speaking," he said. "It was a very conscious decision that in light of that, the people who were on the board would resign."

Americans Elect spokeswoman Ileana Wachtel called the Maine GOP's request for an FEC investigation "a PR stunt that has no merit."

"The expenditure was made in strict compliance with the law, and the organization firmly believes the complaint is baseless," she said.

Wachtel said New York Mayor Michael Bloomberg, an independent, and Americans Elect founder Peter Ackerman each contributed \$500,000 to the King ad campaign. A third donor, Passport Capital founder John Burbank, contributed \$750,000.

King is the only candidate Americans Elect intends to support in this election cycle, Wachtel said.

"At this moment, it's critical that we elect independent-minded leaders to high office, and Angus King running for the United States Senate is that kind of leader," she said.

King in June had called on his rivals to pledge to discourage spending in the race by outside groups hoping to influence the election. Independent groups are allowed under federal election law to raise and spend unlimited sums as long as they don't coordinate their spending with candidates. Republican Charlie Summers rejected the pledge while Democrat Cynthia Dill proposed that the candidates also agree to further campaign spending and contribution limits.

"We didn't know about this ad from Americans Elect, and we certainly didn't ask for it," said King spokeswoman Crystal Canney. King's proposal to have candidates disavow outside spending "would have taken care of this, but we couldn't get Charlie Summers to agree to it."

Americans Elect is registered as a 501(c)(4) nonprofit organization and — unlike candidate campaigns and other political committees registered with the Federal Election Commission — isn't required to disclose its donors. According to the Internal Revenue Service, 501(c)(4) groups are considered social welfare organizations and can engage in some political activity as long as politics isn't the group's primary purpose. ProPublica reported earlier this year, however, that dozens of 501(c)(4) organizations have engaged almost exclusively in political activity, spending millions of dollars on political ads and other election efforts this campaign season.

Americans Elect had been registered under Section 527 of the federal tax code until 2010, when it converted to 501(c)(4) status. Organizations registered under Section 527 are required to disclose their donors.

In its filing with the Federal Election Commission, the Maine GOP said Americans Elect should have registered as a political action committee in order to engage in activity designed to influence the outcome of an election.

But Wachtel said Americans Elect isn't spending money on King's behalf illegally because the expenditures are less than 5 percent of the organization's total budget, and the group's primary activity isn't supporting political candidates.

The Americans Elect ad buy comes at a time when polls show the race for Maine's Senate seat tightening. An internal Republican poll released earlier this week showed King's lead over Summers shrinking to a four-point advantage.

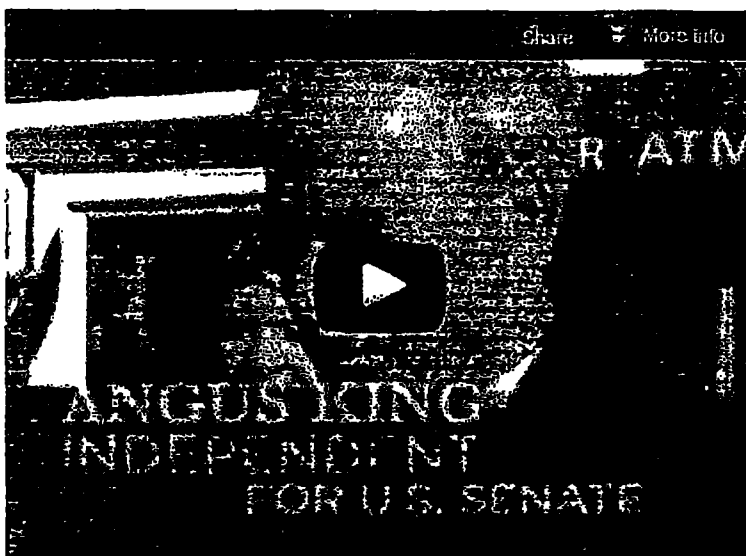
Groups with Republican ties have spent more than \$2 million since late July on TV advertising that targets King for his dealings in the wind business and for his fiscal record as governor. Another spot, sponsored by the recently formed group Maine Freedom, encourages Democrats to choose Dill over King.

While the Democratic Senatorial Campaign Committee hasn't endorsed Dill in the race, the group recently purchased about \$400,000 in advertising targeting Summers. The ad, which started running earlier this week, says Summers "marches with the Washington extremists."

<http://bangordailynews.com/2012/10/05/politics/elections/outside-group-buys-500000-in-ads-supporting-king/> printed on October 26, 2012

Portland Press Herald

 PRINTTHIS



October 5

National group spends \$1.7 million on pro-Angus King ads

Two new TV ads could help Angus King counter Republican attack ads, but may pose political risks.

By John Richardson richardson@mainetoday.com
State House Bureau

A national group that includes New York City Mayor Michael Bloomberg is pumping more than \$1 million into Maine to help elect Angus King to the U.S. Senate, a spokeswoman for Americans Elect said Friday.

Related headlines

- **Summers tries to clarify abortion stance**

Americans Elect, which tried unsuccessfully to mount a nonpartisan presidential campaign this year, aired the first of two television ads Friday promoting King as a solution to the gridlock in Congress.

"We need jobs, not partisan gridlock," an unnamed man says in one of the 30-second ads. "Angus can change that."

The arrival of a powerful new player escalates an already intense advertising war, and pushes outside spending on Maine's Senate race to nearly \$4 million with a month to go before Election Day.

Bloomberg, an independent, was one of three wealthy donors who pitched in a total of \$1.75 million so Americans Elect could support King, who is considered the country's most prominent independent candidate.

Bloomberg contributed \$500,000, Americans Elect's founder Peter Ackerman put in \$500,000 and Passport Capital's founder John Burbank contributed \$750,000, according to Ileana Wachtel, national press secretary for Americans Elect.

"We are solely focusing on this race," Wachtel said. "It's really a moment in our country's history when it is critical that we elect independent-minded leaders to higher office."

King has been the focus of more than \$2 million worth of attack ads by groups that hope to put a Republican majority in the Senate, and his lead over Republican Charlie Summers has narrowed in recent polls.

The new television ad is the first from an outside group to explicitly support King. However, the Democratic Senatorial Campaign Committee has spent about \$400,000 so far on anti-Summers ads -- and is extending its ad buy -- in an apparent effort to protect King's lead in the polls and prevent a Republican victory.

While Americans Elect clearly hopes to shore up King's lead, the ad campaign opens him up to political criticism.

The former governor has steadily criticized the flow of outside money that's aimed at influencing Maine's Senate race.

"We did not know about this ad nor did we ask for it," King's spokeswoman, Crystal Canney, said in a written statement. "All of these ads ... are exactly what Angus warned about in June. We called for all candidates to disavow the ads and Charlie Summers refused."

Canney said the King campaign "will not unilaterally disarm. The time has passed when this money could have been kept out of Maine. ... You can thank the (National Republican Senatorial Committee) and Charlie Summers for turning this into an ad war."

Drew Brandewie, spokesman for Summers, said the real Angus King is revealing himself, now that his lead has dropped in the polls.

Brandewie issued a written statement saying King criticized out-of-state money and negative ads, then went to Washington, D.C., to raise money from lobbyists and started criticizing Summers in an ad and in news releases.

Now, King is getting help from an outside group like those he has been criticizing, Brandewie said.

"The term 'flip-flop' is far too gracious a way to describe the cynical duplicity of Angus King's broken promises," Brandewie said.

Americans Elect tried to hold an online primary and nominate a presidential candidate to challenge the two-party system this year. Its entire board of directors resigned in June when that effort failed, according to Wachtel and Eliot Cutler, who ran for governor in Maine in 2010 and was on the Americans Elect board.

The group's founder and CEO reconstituted the group this summer to help independent-minded candidates in state races.

Cutler is now a state chair of King's Senate campaign. He said he has not had any involvement with the national group since June, although he was named as a director on the group's website Friday.

The Maine Republican Party said Friday that it is seeking a federal investigation into whether the ad campaign violates election law, in part because Cutler is listed as a director of the group at the same time he is working in the King campaign. Outside groups cannot coordinate with the candidates they support.

Maine Republican Party Chairman Charlie Webster said in a written statement that "sinking poll numbers are no excuse for violating the law, which is what Mr. King and his out-of-state supporters appear to have done here."

Cutler denied any involvement with the ad. Wachtel called the complaint baseless.

"Eliot Cutler is not on the board. He resigned June 26 before any expenditure was made or before any funds were raised, and that is in strict compliance with the law," Wachtel said. She said the website was being updated.

Anthony Corrado, a political science professor at Colby College in Waterville and a nationally known expert on campaign finance, said it would be hard to prove illegal coordination even if Cutler was still active with Americans Elect.

"You really have to have a material involvement in the decision (and) communication with the candidate about the specific decision," he said.

Corrado said Americans Elect does not appear to be spending money in other states, and Maine's race is unique.

"Angus King is certainly the most prominent candidate in the country right now that meets their criteria," Corrado said.

Bowdoin College political science professor Michael Franz said the support may help King counter the attack ads, but it also will create some political headaches.

"I think it's just going to create another line of attack against Angus King by the Republicans in the coming weeks," Franz said.

Americans Elect may have protected King from some of that criticism by voluntarily disclosing its donors. Groups that paid for the anti-King attack ads, including the U.S. Chamber of Commerce, have not.

Cutler said Friday that Americans Elect is different from the other outside groups because it is promoting a candidate rather than attacking anyone.

"I know (King) didn't want outside money in Maine's race," Cutler said, but "at least it's saying something positive on behalf of a candidate."

Staff Writer John Richardson can be contacted at 791-6324 or at:

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COUNSEL

STATEMENT OF DESIGNATION OF COUNSEL
Please use *one* form for each Respondent/Entity/Treasurer
FAX (202) 219-3923

MUR # 6660

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The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

10/27/12 Kal J. R. Campaign Manager
Date Respondent/Agent -Signature Title(Treasurer/Candidate/Owner)

RESPONDENT: Angus King for U.S. Senate Campaign
(Committee Name, Company Name, or Individual Named in Notification Letter)

MAILING ADDRESS: Angus King for U.S. Senate Campaign
(Please Print)
135 Maine Street
Brunswick, ME 04011

TELEPHONE- HOME ()

BUSINESS (207) 607-4300

Information is being sought as part of an investigation being conducted by the Federal Election Commission and the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section prohibits making public any investigation conducted by the Federal Election Commission without the express written consent of the person under investigation



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STATEMENT OF DESIGNATION OF COUNSEL
Please use one form for each Respondent/Entity/Treasurer
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MUR # 6660

NAME OF COUNSEL: Elizabeth R. Butler, Esq.

FIRM: Pierce Atwood LLP

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FAX (207) 791-1350

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The above-named individual and/or firm is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

10/25/12
Date

Angus S. King, Jr.
Respondent/Agent-Signature

Candidate
Title(Treasurer/Candidate/Owner)

RESPONDENT: Angus S. King, Jr.

(Committee Name, Company Name, or Individual Named in Notification Letter)

MAILING ADDRESS: Angus King for U.S. Senate Campaign
(Please Print)

135 Maine Street
Brunswick, ME 04011

TELEPHONE- HOME ()

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